

EXHIBIT 11

research editor of the *University of Pittsburgh Law Review* and was a teaching assistant for first-year legal research and writing courses. I obtained a Bachelor of Arts in government and political affairs from Millersville University in 2006.

4. I have been a member of the Pennsylvania Bar since October 2009, the District of Columbia bar since May 2010, and the Arizona bar since September 2013. In addition, I am admitted to the bars of the United States Courts of Appeals for the Second and Ninth Circuits.

5. For the bars and courts in which I am admitted, I am a member in good standing and there are no grievance proceedings or any other disciplinary actions pending against me. In addition, I have never been held in contempt of court, censured, disbarred, or suspended by any court.

6. I have practiced law for almost 9 years. Following law school, I worked as an associate attorney at Wiley Rein LLP in Washington, D.C. from 2009 to 2014, where I represented clients in a variety of complex insurance litigation issues before federal and state courts, including motions practice, discovery, and briefing. While at Wiley Rein, I also drafted *amicus* appellate briefs on behalf of insurance trade organizations on complex insurance coverage issues. In addition, I conducted research for and drafted pleadings in federal and state courts addressing a wide variety of procedural and substantive legal issues for clients involved in complex insurance coverage litigation.

7. Upon leaving Wiley Rein, I served as a prosecutor in the Maricopa County Attorney's Office from 2014 to 2015, where I handled pre-trial felony matters and prosecuted hundreds of misdemeanor cases, including entering into plea agreements and conducting jury and bench trials.

8. I joined Alliance Defending Freedom in March 2015, where I currently serve as Legal Counsel. In this capacity, I practice exclusively in the areas of civil rights and constitutional litigation, with a special emphasis on the constitutional rights of churches and religious institutions. I have represented religious institutions in state and federal courts across the country, and I am involved in all aspects of litigation, including discovery, motions practice, briefing, oral argument, and appeals.

Preclusion of Other Employment

9. By working on Trinity Lutheran's motion for attorney's fees and costs, I was precluded from working on other matters or taking on other representation I might otherwise have been able to take on.

Reasonableness of Rate

10. As a non-profit organization, Alliance Defending Freedom represents its clients on a *pro bono* basis.

11. The *pro bono* representation of our clients and the national scope of our practice mean that we do not have internal billing rates. Alliance Defending

Freedom's attorneys' rates are determined by billing practices in the legal market where a case is pending.

12. I have investigated and obtained information to familiarize myself with the hourly billing rates of attorneys with skill and experience in the First Amendment area of law who practice in the Kansas City, Missouri, area near where this case originated and in the Phoenix, Arizona, area, where my practice is located.

13. In my opinion, my hourly billing rate of \$350.00 is consistent with the prevailing market rates in the Kansas City and Phoenix areas for attorneys with comparable experience and skill.

Reasonableness of Time

14. The concurrently filed itemized statement sets forth my time records based upon my contemporaneous documentation of time devoted to this matter. I exercised billing judgment by reducing duplicative or otherwise unreasonable time expenditures. These reductions are documented in the itemized statement.

15. The total time I incurred on this case is 41.00 hours. After I reviewed my time and exercised critical billing judgment, this amount was reduced to 28.40 hours. At a billing rate of \$350.00 per hour, this results in a current amount of \$9,940.00 that may properly be claimed against Defendants.

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 12th day of July 2018, at Scottsdale, Arizona.

/s Jeremiah Galus

JEREMIAH GALUS
ALLIANCE DEFENDING FREEDOM
15100 N. 90th St.
Scottsdale, AZ 85260
Telephone: 480-444-0020
Facsimile: 480-444-0028
jgalus@ADFlegal.org